



November 29, 2018

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

ATTN: Video Division, Media Bureau

Re: MB Docket No. 18-320, RM-11817
Comments in Support of NPRM to Amend the DTV Table of
Allotments

Dear Ms. Dortch:

ION Media Lexington License, Inc., licensee of commercial television station WUPX-TV, Morehead, Kentucky, hereby transmits the enclosed Reply Comments in support of the Notice of Proposed Rulemaking to delete Channel 21 at Morehead, Kentucky and substitute Channel 21 at Richmond Kentucky in the DTV Table of Allotments.

If any additional information is needed in connection with this matter, please contact the undersigned.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Terri McGalliard", written over a horizontal line.

By: Terri McGalliard, Secretary
ION Media Lexington License, Inc.

Enclosure

cc: Ms. Joyce Bernstein (*via e-mail*)
Mr. David Brown (*via e-mail*)
Mr. Darren Fernandez (*via e-mail*)
Ms. Terri M. Santisi (*via e-mail*)

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
Amendment of Section 73.622(i))	MB Docket No. 18-320
Digital Television Table of Allotments)	RM-11817
(Morehead and Richmond, Kentucky)	

To: Office of the Secretary
Attn: Chief, Video Division, Media Bureau

REPLY COMMENTS AND EXPRESSION OF CONTINUED INTEREST

ION Media Lexington License, Inc. ("ION") licensee of WUPX-TV, Morehead, Kentucky, FCC Facility Identification Number 23128 (the "Station"), pursuant to Sections 1.415 and 1.419 of the Commission's Rules,¹ hereby submits these reply comments in response to the Commission's Notice of Public Rulemaking (the "*NPRM*") in the above-captioned proceeding.

The *NPRM* proposes to delete Channel 21 at Morehead, Kentucky and substitute Channel 21 at Richmond, Kentucky in the DTV Table of Allotments. ION strongly supports the proposed substitution to change the Station's community of license, and ION hereby expresses its continuing interest in pursuing the reallocation of Channel 21 from Morehead to Richmond. Substitution of Richmond, Kentucky as the Station's community of license with continued operations on Channel 21 will represent a preferential arrangement of allotments by affording Richmond its first local full-power television service in satisfaction of the Commission's second allotment priority.²

As demonstrated in the Petition, Richmond is a vibrant, substantial community of 31,364. Richmond is the third largest city on the "Bluegrass Region" and is the county seat for Madison

¹ See 47 C.F.R. §§ 1.415, 1.419.

² See *NPRM* at ¶ 3.

County, Kentucky. Richmond's population is more than four times larger than Morehead's population of 6,845. Richmond exhibits all the traditional indicia of community recognized by the Commission, including a local government, police force, and fire and rescue departments; as well as a local newspaper, four hospital/medical centers, five museums, and six radio stations, and much, much more. Richmond also is the home to Eastern Kentucky University. By any measure, Richmond is a community deserving of a first local television service.

Moreover, ION asserts that Morehead will continue to have a station allotted to it, Kentucky Educational Television Station WKMR(TV), licensed to Kentucky Authority of Educational TV, on channel *15 at Morehead.

As described in its petition for rulemaking and in the foregoing, ION strongly supports the proposed rulemaking to substitute Richmond for Morehead as the community of license for WUPX-TV. Allowing WUPX-TV to change its community of license from Morehead to Richmond is in the public interest, and the FCC should approve the *NPRM* promptly.

Respectfully submitted,
ION Media Lexington License, Inc.



By: Terri McGalliard, Secretary

November 29, 2018